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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,

15 v.
16 Plaintiff,

17 APPROXIMATELY \$11,000.00 IN
18 U.S. CURRENCY,

19 Defendant.

2:22-MC-00156-WBS-KJN

20 STIPULATION AND ORDER EXTENDING TIME
21 FOR FILING A COMPLAINT FOR FORFEITURE
22 AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

23 It is hereby stipulated by and between the United States of America and potential claimant Alana
24 Wynne (“claimant”), by and through their respective counsel, as follows:

25 1. On or about February 16, 2022, claimant filed a claim in the administrative forfeiture
26 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
\$11,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on November 30, 2021.

27 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
28 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a
claim to the defendant currency as required by law in the administrative forfeiture proceeding.

29 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
30 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was May 17, 2022.

4 4. By Stipulation and Order filed May 17, 2022, the parties stipulated to extend to July 15,
5 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
9 August 12, 2022, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 6. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to August 12, 2022.

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16 Dated: 07/14/22

PHILLIP A. TALBERT
United States Attorney

17 By: /s/ Kevin C. Khasigian
18 KEVIN C. KHASIGIAN
19 Assistant United States Attorney

20
21 Dated: 07/14/22

/s/ Bruce Rivers
22 BRUCE RIVERS
23 Attorney for potential claimant
24 Alana Wynne
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26 (Signature authorized by phone)

1 **IT IS SO ORDERED.**

2 Dated: July 14, 2022



3 **WILLIAM B. SHUBB**
4 **UNITED STATES DISTRICT JUDGE**

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